

December 17, 2024

Nathan Ochsner, Clerk of Court

**Sealed**  
Public and unofficial staff access  
to this instrument are  
prohibited by court order

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA

vs.

**JESUS CARLOS SILVA,  
a/k/a “Carlos Silva,”**

**Defendant.**

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**CRIMINAL NO. 4:24-cr-00639****(Sealed)****INDICTMENT**

THE GRAND JURY CHARGES THAT:

**OVERVIEW OF SCHEME TO DEFRAUD**

1. At various times material to this Indictment, defendant JESUS CARLOS SILVA, a/k/a “Carlos Silva,” the defendant, was a resident of Houston, Texas.

2. From in or about March 2022 through in or about December 2024, JESUS CARLOS SILVA, a/k/a “Carlos Silva,” and others known and unknown to the grand jury, operated a scheme to defraud immigrants to the United States with the false promise that SILVA would help those immigrants obtain U.S. citizenship or other legal immigration status (the “Immigration Scheme”). The targets of the fraud were primarily Spanish-speaking immigrants living in Texas, Illinois, Louisiana, and Florida (the “Victims”).

3. As part of the Immigration Scheme, JESUS CARLOS SILVA, a/k/a “Carlos Silva,” made various material misrepresentations and false statements to Victims in order to induce Victims to pay thousands of dollars to SILVA. SILVA pretended to be an immigration attorney affiliated with a Houston-based law firm. In fact, SILVA was not an attorney. SILVA told Victims, most of whom lacked legal immigration status in the United States, that he could help

them obtain U.S. citizenship and/or other legal immigration status. SILVA represented to some of the Victims that he had a close relative or contact who worked for the U.S. Citizenship and Immigration Services (“USCIS”) who would process the Victims’ applications.

4. JESUS CARLOS SILVA, a/k/a “Carlos Silva,” worked with at least two other unindicted co-conspirators (“CC-1” and “CC-2”) to execute the Immigration Scheme. SILVA, CC-1, and CC-2 met with Victims at various locations in the vicinity of Chicago, Illinois and Houston, Texas to pitch the Victims on paying them for immigration services, and to collect payments from the Victims. SILVA and CC-1 also communicated with Victims by cellphone regarding the status of their cases.

5. JESUS CARLOS SILVA, a/k/a “Carlos Silva,” charged Victims thousands of dollars per person for SILVA’s assistance with their immigration cases. Victims paid SILVA by various means, including by sending cashier’s check and checks through the mail to addresses in Houston, Texas, sending money orders, and providing SILVA, CC-1, and CC-2 with cash and checks in person. As part of the Immigration Scheme, SILVA defrauded over 100 Victims.

6. After taking the Victims’ money, JESUS CARLOS SILVA, a/k/a “Carlos Silva,” did not provide the Victims with any actual assistance with their immigration status and did not procure legal immigration status for them. Instead, SILVA would provide Victims with a variety of excuses as to why they had not seen any progress in their applications, and eventually would stop responding to Victims’ communications. On multiple occasions, SILVA directed Victims to travel to Houston, Texas for an alleged appointment with USCIS. Once the Victims arrived in Houston, SILVA gave excuses for why he could not meet them, and the Victims learned there was no actual appointment.

**COUNT ONE**  
**(Conspiracy to Commit Mail and Wire Fraud)**

7. The Grand Jury re-alleges paragraphs 1 through 6 of this Indictment.

8. From in or around March 2022 through in or around December 2024, within the Southern District of Texas and elsewhere,

**JESUS CARLOS SILVA,**  
**a/k/a “Carlos Silva,”**

defendant herein, did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the grand jury, to commit certain offenses against the United States, namely, mail fraud, in violation of Title 18, United States Code, Section 1341; and wire fraud, in violation of Title 18, United States Code, Section 1343.

9. It was a part and an object of the conspiracy that JESUS CARLOS SILVA, a/k/a “Carlos Silva,” and others known and unknown to the grand jury, knowingly having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, that is, the Immigration Scheme described above, and for the purpose of executing such scheme and artifice and attempting to do so, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom, a matter and thing, and knowingly cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, a matter and thing, that is, SILVA caused the Victims of the Immigration Scheme to mail him payments to addresses in Houston, Texas, in violation of Title 18, United States Code, Section 1341.

10. It was a part and an object of the conspiracy that JESUS CARLOS SILVA, a/k/a

“Carlos Silva,” and others known and unknown to the grand jury, knowingly having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, that is, the Immigration Scheme described above, and for the purpose of executing such scheme and artifice and attempting to do, did knowingly transmit and cause to be transmitted, by means of wire and radio communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, that is, SILVA caused Victims of the Immigration Scheme to use interstate and international phone calls to communicate about the Immigration Scheme, and interstate wires for the deposit of funds, in violation of Title 18, United States Code, Section 1343.

**All in violation of Title 18, United States Code, Section 1349.**

**COUNTS TWO THROUGH FOUR**  
**(Mail Fraud)**

11. The Grand Jury re-alleges paragraphs 1 through 6 of this Indictment.
12. On or about the dates listed below, in the Southern District of Texas and elsewhere,

**JESUS CARLOS SILVA,**  
**a/k/a “Carlos Silva,”**

the defendant, together with others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, and for the purpose of executing such scheme and artifice, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom, a matter and thing, and knowingly cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, a matter and thing, as set forth below:

Count	Date	Mailing
2	06/17/2022	\$3,500 cashier's check from Victim G.C. sent from a United States Postal Service office in Cicero, Illinois to "Jesus Carlos Silva" at an address in Houston, Texas
3	8/20/2022	\$6,000 cashier's check from Victim I.M. sent from a UPS store in La Grange, Illinois to "Jesus Carlos Silva" at an address in Houston, Texas
4	10/3/2022	\$4,500 cashier's check from Victim I.M. sent from a UPS store in La Grange, Illinois to "Jesus Carlos Silva" at an address in Houston, Texas

**All in violation of Title 18, United States Code, Section 1341 and 2.**

**COUNTS FIVE THROUGH SEVEN**  
**(Wire Fraud)**

13. The Grand Jury re-alleges paragraphs 1 through 6 of this Indictment.
14. On or about the dates listed below, in the Southern District of Texas and elsewhere,

**JESUS CARLOS SILVA,**  
**a/k/a "Carlos Silva,"**

the defendant, together with others known and unknown, did knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, and for the purpose of executing such scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, as set forth below:

Count	Date	Wire or Radio Communication
5	03/13/2023	JESUS CARLOS SILVA, a/k/a “Carlos Silva,” who was in the United States, made a phone call to CC-1, who was traveling in Mexico
6	03/25/2023	CC-1, who was traveling in Mexico, made a phone call to Victim E.F. in the United States
7	03/30/2023	JESUS CARLOS SILVA, a/k/a “Carlos Silva,” who was located in the vicinity of Houston, Texas, made a phone call to Victim A.P., who was located in the vicinity of Chicago, Illinois

**All in violation of Title 18, United States Code, Section 1343 and 2.**

**COUNTS EIGHT THROUGH TEN**

**(Engaging in Monetary Transactions in Criminally Derived Property)**

15. The Grand Jury re-alleges paragraphs 1 through 6 of this Indictment.
16. On or about the dates listed below, in the Southern District of Texas and elsewhere,

**JESUS CARLOS SILVA,  
a/k/a “Carlos Silva,”**

the defendant, did knowingly engage, attempt to engage, and cause others to engage in monetary transactions affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is, the transfer and withdrawal of funds from and to the financial institutions identified below, such property having been derived from a specified unlawful activity, that is, mail fraud and wire fraud:

Count	Date	Monetary Transactions
8	3/25/2022	Wire transfer of \$35,000 from PNC Bank Account held in the name of Jesus Carlos Silva to PNC Bank Account held in the name of Rodolfo Rangel
9	4/8/2022	Wire transfer of \$35,000 from PNC Bank Account held in the name of Jesus Carlos Silva to PNC Bank Account held in the name of Rodolfo Rangel

Count	Date	Monetary Transactions
10	4/22/2022	Wire transfer of \$35,000 from PNC Bank Account held in the name of Jesus Carlos Silva to PNC Bank Account held in the name of Rodolfo Rangel

**All in violation of Title 18, United States Code, Sections 1957 & 2.**

A True Bill:

**Original Signature on File**

Grand Jury Foreperson

ALAMDAR S. HAMDANI  
United States Attorney

By: Jessica Feinstein  
Jessica Feinstein  
Assistant United States Attorney  
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